

1 The parties further stipulate and jointly request that time be excluded from the
2 Speedy Trial Act calculations from Thursday, August 26, 2010 through Thursday,
3 September 2, 2010 for effective preparation of counsel, including among other reasons
4 the need to resolve the motions regarding outstanding subpoenas and the review of a
5 large quantity of evidence. The parties agree that the ends of justice served by granting
6 such a continuance outweigh the best interests of the public and the defendants in a
7 speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

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9 IT IS SO STIPULATED.

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11 DATED: August 13, 2010

/s/
DAVID W. SHAPIRO
Attorney for Christine D. Reyes

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14 DATED: August 13, 2010

/s/
LOREN STEWART
Attorney for Maria Virginia Reyes

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17 DATED: August 13, 2010

/s/
THOMAS MOORE
Assistant United States Attorney

~~PROPOSED~~ ORDER

For good cause shown, the status conference now scheduled for Thursday, August 26, 2010 is vacated. The matter shall be added to the Court's calendar on Thursday, September 2, 2010 at 2:00 p.m.

In addition, for the reasons stated above, the Court finds that an exclusion of time from August 26, 2010 through September 2, 2010 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 8/25/2010

